

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TONYA BROOKS

11 CIV. 0706

(In the space above enter the full name(s) of the plaintiff(s).)

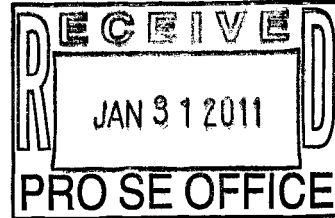
-against-

New York City Police Dept.

**COMPLAINT
FOR EMPLOYMENT
DISCRIMINATION**

Jury Trial: ☒ Yes ☐ No
(check one)

(In the space above enter the full name(s) of the defendant(s).
If you cannot fit the names of all of the defendants in the space
provided, please write "see attached" in the space above and
attach an additional sheet of paper with the full list of names.
Typically, the company or organization named in your charge
to the Equal Employment Opportunity Commission should be
named as a defendant. Addresses should not be included here.)



This action is brought for discrimination in employment pursuant to: (check only those that apply)

☒

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

NOTE: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.

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Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 - 634.

NOTE: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.

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Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 - 12117.

NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.

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New York State Human Rights Law, N.Y. Exec. Law §§ 290 to 297 (age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status).

☒

New York City Human Rights Law, N.Y. City Admin. Code §§ 8-101 to 131 (actual or perceived age, race, creed, color, national origin, gender, disability, marital status, partnership status, sexual orientation, alienage, citizenship status).

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name TONYA BROOKS
 Street Address 2220 WALLACE AVE #2D
 County, City BRONX, NY 10467
 State & Zip Code NEW YORK 10467
 Telephone Number 718 798 1813

- B. List all defendants' names and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant Name NEW YORK CITY POLICE DEPT.
 Street Address ONE POLICE PLAZA
 County, City NEW YORK
 State & Zip Code NEW YORK 10007
 Telephone Number 646 610 5000

- C. The address at which I sought employment or was employed by the defendant(s) is:

Employer NEW YORK CITY POLICE DEPT. (PSA #6)
 Street Address 2770 8th AVE
 County, City NEW YORK
 State & Zip Code NEW YORK 10039
 Telephone Number 212 694 7700

II. Statement of Claim:

State as briefly as possible the facts of your case, including relevant dates and events. Describe how you were discriminated against. If you are pursuing claims under other federal or state statutes, you should include facts to support those claims. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

- A. The discriminatory conduct of which I complain in this action includes: *(check only those that apply)*

☐ Failure to hire me.
☐ Termination of my employment.
☐ Failure to promote me.
☐ Failure to accommodate my disability.
☐ Unequal terms and conditions of my employment.

☒ Retaliation.

☒ Other acts (specify): Discrimination.

Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.

B. It is my best recollection that the alleged discriminatory acts occurred on: 1.3.08
Date(s)

C. I believe ☒ that defendant(s) (check one):

☒ is still committing these acts against me.

☐ is not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check only those that apply and explain):

☒ race African American ☒ color Brown

☐ gender/sex _____ ☐ religion _____

☒ national origin African American

☐ age. My date of birth is _____ (Give your date of birth only if you are asserting a claim of age discrimination.)

☐ disability or perceived disability, _____ (specify)

E. The facts of my case are as follow (attach additional sheets as necessary):

On Jan. 3, 2008 I received A Command Discipline from a Supervisor that was Totally Fabricated Based on an Act of Excessive force that I Observed performed on an innocent Civilian Visitor To the Command. In Continuous Retaliation I was put on forced Monitoring Both Level I, then Level II. Command Discipline Are Continued To Be issued Unfairly.

Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, the New York State Division of Human Rights or the New York City Commission on Human Rights.

III. Exhaustion of Federal Administrative Remedies:

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding defendant's alleged discriminatory conduct on: December 17, 2008 (Date).

B. The Equal Employment Opportunity Commission (check one):

☒ has not issued a Notice of Right to Sue letter.
☐ issued a Notice of Right to Sue letter, which I received on 11-10-08 (Date).

Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.

C. Only litigants alleging age discrimination must answer this Question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct (check one):

☐ 60 days or more have elapsed.
☐ less than 60 days have elapsed.

IV. Relief:

WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, and costs, as follows: I'm requesting that the Unfair AND Discriminatory, Retaliation Be Acknowledged AND Strongly Discouraged, AND Ultimately Stopped.
(Describe relief sought, including amount of damages, if any, and the basis for such relief.) By the type

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 31 day of January, 2011

Signature of Plaintiff

Address

Telephone Number

Fax Number (if you have one)

J. Brooks

2220 Wallace Ave #2D
Bronx NY 10467

718 798 1813

Please Be Advised I Did
receive A "Right To Sue letter"
on Approximately Nov 11, 2010
An Said letter will need to
Be Replaced Due To An
Unforeseen Accident.
EEOC Charge No: 520-2009-00464

J. Brooks